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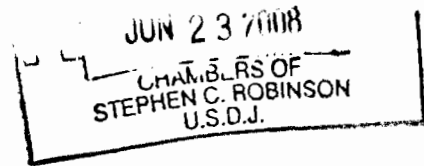
Stephen Bergstein
Helen G. Ullrich

Of Counsel
Christopher D. Watkins

MEMO ENDORSED VIA FACSIMILE & MAIL

June 20, 2008

Hon. Stephen C. Robinson, U.S.D.J.
United States District Court
Southern District of New York
300 Quarropas Street
White Plains, NY 10601



re: Ramos v. Pillar, Inc.
07 Civ. 4047 (SCR)

Dear Judge Robinson:

This firm represents plaintiff Nicole Ramos in this pregnancy discrimination lawsuit brought pursuant to Title VII and the New York Human Rights Law. I am writing to request a 60-day extension of discovery, with consent of opposing counsel, to August 25.

Discovery is presently set to close on June 25. Counsel have diligently worked to conduct discovery and are now taking depositions. We need additional time to take one or two more depositions and to conduct a computer search for additional documents. This is the second request in this case for an extension of discovery and the first request by plaintiff.

Thank you for your consideration in this matter.

Sincerely,


Helen G. Ullrich

cc: Justin W. Gray, Esq.
Iseman, Cunningham, Riester & Hyde, LLP
Counsel for Defendant

APPLICATION GRANTED

 6/24/08
HON. STEPHEN C. ROBINSON